

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

ARISE FOR SOCIAL JUSTICE; ~~LOISTE~~;  
NEW ENGLAND STATE-AREA  
CONFERENCE OF THE NAACP; REV.  
TALBERT W. SWAN, II; NORMAN W.  
OLIVER, DARLENE ANDERSON,  
GUMERSINDO GOMEZ; FRANK BUNTIN;  
RAFAEL RODRIQUEZ; and DIANA NURSE,

Plaintiffs,

v.

CITY OF SPRINGFIELD and SPRINGFIELD  
ELECTION COMMISSION,

Defendants.

Civil Action No. 05-30080 MAP

**AFFIDAVIT OF DARNELL WILLIAMS**

I, Darnell Williams, hereby certify as follows:

1. I am the President and CEO of the Urban League of Eastern Massachusetts, a position I have held for the past five years. I am African American and a resident of Roxbury, MA.

2. I lived in Springfield, MA for approximately 30 years, until I moved to Boston to accept a position on the Urban League.

3. From 1996 to 2001 I was President of the Springfield Chapter of the NAACP; and from 1999 to 2001 I was President of the New England Area Conference of the NAACP. I was Fire Commissioner for the City of Springfield for 10 years and was Vice Chair of the Fire Commission. I served on the Mayor's Task Force on Children and Youth and several other Springfield committees and task forces. I also served as Springfield State Representative Raymond Jordan's campaign manager and treasurer for 20 years.

4. I ran for Springfield City Council in 1991 and 1993. I did not win either election. I believe I received the majority of the African American vote. I also ran for State Representative in 1994.

5. As a result of living in Springfield for 30 years, my active involvement in public service and political organizations, my activities as a community leader, and my experiences as a City Council candidate, I am aware of the difficulties faced by candidates of color who must run

at large for City Council and School Committee. I am also knowledgeable about discrimination faced by people of color in Springfield in many areas of their lives.

6. When I ran for City Council in Springfield the biggest impediment to my election was being able to get my message out across the city, particularly to the white community. The most effective way to do that was through TV and newspaper ads, which cost significant sums of money. Many African American and Latino candidates do not have the funds available to buy costly TV and print media advertising and thus it is very difficult for them to get the visibility they need to be elected citywide. It is also more difficult for African American and Latino candidates to raise money for campaigns because their supporters, who are mainly other African Americans and Latinos, cannot make large contributions.

7. Most African American and Latino candidates do not have the connections and name recognition in the white areas of Springfield. Many in the white community vote for those whose names they know, who are related to people they know or who have been in office for years. Without money, connections, name recognition and visibility, it is virtually impossible for candidates of color, particularly first time candidates, to win citywide elections in Springfield. I know of many persons of color who wanted to run for City Council or School Committee but chose not to because they thought it would be futile.

8. In order for African Americans or Latinos to win an at large election they must have the endorsement of the newspaper and the prominent white business and political leaders. These endorsements are very difficult for African Americans and Latinos to obtain, even if they are well qualified for political office.

9. I have at times recommended that African Americans bullet vote in order to have a better chance of getting elected because they are generally not successful in getting votes from the white community.

10. In order to get elected African American and Latino candidates need support from the predominantly white areas of Forest Park, East Forest Park, Sixteen Acres, East Springfield and Indian Orchard. It was always difficult for minority candidates to get a foothold in these white neighborhoods. Sometimes whites say they will support you, but in fact never vote for you if you are African American.

11. When I ran for City Council, despite being very qualified by virtue of my education, having a Master in Education from Boston University, being a community leader and serving in many city positions, I felt that people in the white community marginalized me because I was African American. There appeared to be an unwritten rule that only one African American at a time could serve on the City Council. This was true for many years. I believe there was only one term when there were two African Americans serving at the same time in recent history. People seemed to feel that one African American was enough.

12. When I ran for City Council in 1991, the Springfield Union-News declined to endorse a particular African American challenger, suggesting instead that voters pick one of the four African American non-incumbents running that year. They endorsed more than one white incumbent but yet would not endorse more than one African American challenger.

13. White candidates often get elected because they promise that they will do things for the African American and Latino communities. However when they get elected they do not keep their promises.

14. The at-large system has kept African Americans and Latinos from working together because each group has concentrated on trying to get votes from their own community.

15. The current City Council and School Committee are not representative of the racially and ethnically diverse population that resides in Springfield. I believe that African Americans and Latinos would be able to get elected in greater numbers in district elections and that there would be more qualified candidates running.

16. A district representation system would increase cooperation between the Latino and African American communities. It would give candidates greater visibility in the community and provide greater interest in obtaining more city services and resources for the neighborhoods.

17. I have first hand experience with and knowledge of discrimination in Springfield in the areas of housing, employment, education and health. I was particularly involved in speaking out against discrimination by the police department. Police brutality, harassment and intimidation of people of color have been a long-standing and serious problem in Springfield. I tried to get the U.S. Department of Justice to withhold federal funds from the city until the police department ended its brutal and discriminatory practices.

18. I am aware of disparities in health in the minority communities in Springfield, including high infant mortality rates, higher asthma rates and other health problems, which are disproportionately more prevalent in African American and Latino communities.

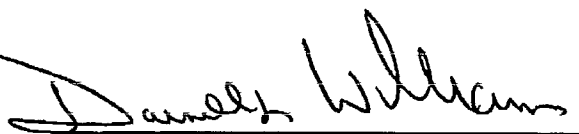
19. I am also aware of discrimination in the education system in Springfield. There is a clear achievement gap between minority students in Springfield and white students, both in Springfield and statewide as evidenced by lower test scores and graduation rates. There is also discrimination in the allocation of resources to minority schools. Minority schools do not receive the resources necessary to meet the needs of the student population they serve. Many of these schools were neglected over the years and students have particular needs that are not being met. When there are cuts in the school budget, all schools may get cut the same amount, but the minority schools with the greatest needs are harmed the most. In addition, I do not believe there are sufficient numbers of minority teachers in the Springfield schools.

20. I believe many white politicians have been unresponsive to the needs and concerns of the communities of color. The indifference to the widespread police brutality and harassment and excessive use of force on African Americans is one example. The city simply never took effective action to deal with this issue.

21. Whites are disproportionately represented on the City Council. The one African American councilor and the one Latino councilor representing the interests of the African American and Latino communities in Springfield, most often have to compromise in order to get any measures passed that respond to the specific needs of those communities.

22. Because of the years of discrimination in many aspects of their lives and their inability to elect candidates of their choice, African Americans have often felt it futile to vote. They were made to feel that their votes don't count. This view is reinforced by the repeated defeat of minority candidates and the ability to elect very few African American candidates on a citywide, at-large basis.

Signed under penalties of perjury, this 1 day of February 2007.

  
Darnell Williams

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 2, 2007.

/s/ Paul E. Nemser